

United States v. Abdul Malik Abdul Kareem

2:15-cr-00707-SRB

## EXHIBIT 3

# Drake Law, PLC

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January 3, 2019

Joseph E. Koehler, AUSA  
Kristen Brook, AUSA

VIA: email [joe.koehler@usdoj.gov](mailto:joe.koehler@usdoj.gov), [Kristen.brook@usdoj.gov](mailto:Kristen.brook@usdoj.gov)

RE: USA v. Abdul Malik Abdul Kareem, 2:15-cr-00707-SRB

Joe, I understand from our recent communications that you are still dealing with the FBI in terms of your response to my September 6, 2018, request for further disclosures. Kristin indicated in her September 10, 2018 message that in order to give a “substantive and complete” response it might take a few weeks. We have talked periodically since then and you have assured me that you and the FBI were trying to resolve issues so you could respond to the request. You did so again today. However, it has been almost four months and I have yet to receive anything.

In my September 6 request I asked that you respond promptly so I could raise any issues with the court. It would seem reasonable that you could resolve internal issues regarding disclosure within four months’ time. The defense wants the requested items and has given the government more than adequate time.

Some of these disclosure issues seems out of your control and under FBI control. It appears that much of what you produced this summer was redacted by other individuals for other purposes, purposes not directly related to this case. That concerns me. I know your character and efforts, Joe, but the fact that the FBI seems in control of the evidence and disclosures is disquieting.

Please advise me, in writing, within ten days regarding the status of your response to my September 6, 2018 request for additional disclosures. I can work with a partial response, an answer or response to some of the requests, but not the lack of any response.

Respectfully,

Daniel R Drake, Esq.  
DRAKE LAW, PLC

cc. Dan Maynard